

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

RICHARD GOULD,

Defendant

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Case No. 1:21-cr-00159-JPC

Judge J. Philip Calabrese

DEFENDANT'S STATUS REPORT

The undersigned, counsel for Defendant Richard Gould in the above-captioned case, hereby notifies this Honorable Court that the Defendant had surgical cord denervation and cremaster lysis surgery, along with removal of a lipoma, on October 18, 2022. The surgery was performed by Dr. Neel Parekh at the Cleveland Clinic and was scheduled on very short notice because of the amount of pain the Defendant was experiencing. This was the groin surgery referenced in the October 5, 2022, Zoom attorney conference with the court.

The Defendant has been prescribed Oxycodone pain medication and will return to Dr. Parekh for a post-operative visit on December 9, 2022. At that time there may be further review by Dr. Savage, his spine surgeon, in order to determine when and what type of surgery needs to be performed regarding the pain experienced since his spinal surgery earlier this year.

Because of his current need for narcotic pain medication the Defendant will not be in a competent state on October 26, 2022, in order to participate in a change of plea hearing. A request is hereby made on behalf of the Defendant to reschedule such hearing for a time period after his December 9, 2022 surgery post-operative visit. Assistant United States Attorney Brian McDonough has

been advised of this request and has no objection. Counsel will be available on October 26, 2022, at 11:00 a.m. if the Court wishes to have an attorney conference during the time period scheduled for the change of plea hearing.

Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of this Status Report was sent to Assistant United States Attorney Brian McDonough on October 23, 2022, by e mail addressed to Brian.McDonough@usdoj.gov.



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Attorney for Defendant